

BOULT • CUMMINGS  
CONNERS • BERRY PLC

REC'D TN  
REGULATORY AUTH.

Henry Walker  
(615) 252-2363  
Fax: (615) 252-6363  
Email: hwalker@boultcummings.com

01 NOV 8 PM 4 09

November 7, 2001

OFFICE OF THE  
EXECUTIVE SECRETARY

David Waddell  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243

Re: Complaints of Access Integrated Networks, Inc. (AIN) and XO  
Tennessee, Inc. Against BellSouth Telecommunications, Inc.

Docket No: 01-00868

Dear David:

Enclosed please find the original and thirteen copies of a Petition to Intervene filed on behalf of ITC^DeltaCom in the above-captioned proceeding. A \$25.00 is enclosed for the filing fee. Please contact me with any questions.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By:

Henry Walker

HW/CW

**BEFORE THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE**

**November 7, 2001**


IN RE: Complaints of Access Integrated Network, Inc and XO Tennessee, Inc. Against  
BellSouth Telecommunications, Inc.  
Docket No. 01-00868

**PETITION TO INTERVENE**

ITC^DeltaCom petitions the Authority to intervene as a matter of right in the above-captioned proceeding pursuant to T.C.A. § 4-5-310.

The above-captioned docket concerns complaints of ACCESS integrated Networks, Inc. (AIN) and XO Tennessee, Inc. against BellSouth Telecommunications, Inc. Both companies provide documentation which establishes that BellSouth offered customers reduced prices for regulated service in violation of BellSouth's tariffs and state law. As a competitive, local exchange carrier, ITC^DeltaCom may have suffered economic harm as a result of BellSouth's action and, therefore, has a legally recognizable interest in the outcome of these proceedings.

Respectfully submitted,

By:   
Henry Walker  
Boult, Cummings, Connors & Berry, PLC  
414 Union Street, Suite 1600  
P. O. Box 198062  
Nashville, Tennessee 37219  
(615) 252-2363